

FIG. 1

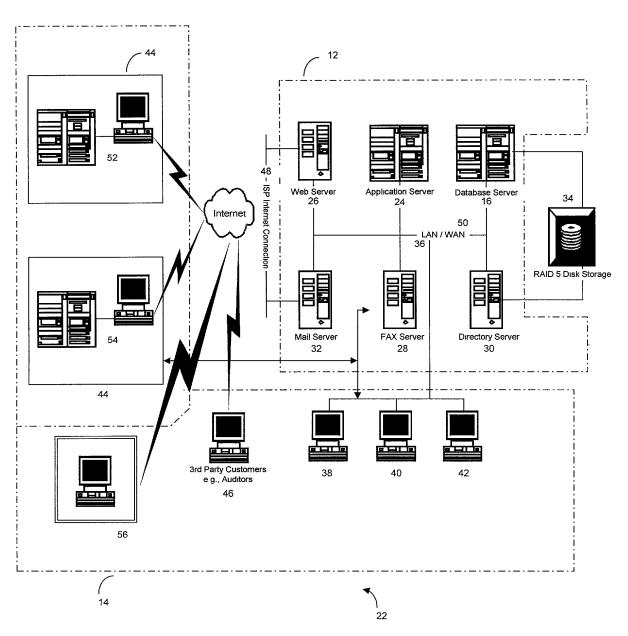


FIGURE 2

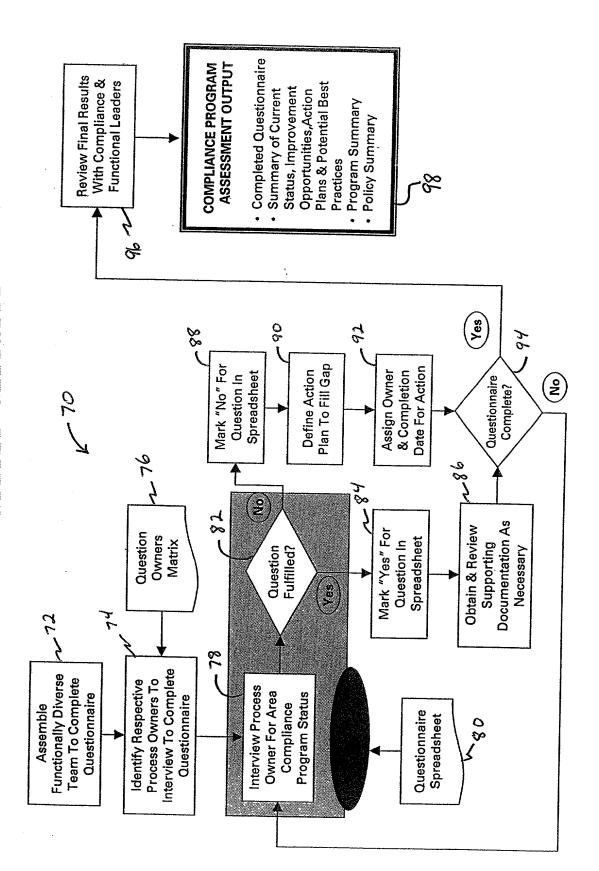


FIG. 3

Compliance Assessment Areas INFRASTRUCTURE 1. Leadership Commitment & Operational Ownership II. Training III. Communication & Management Reporting IV. Resources IV. Discipline & Enforcement IV. Resources III. Bolas & Responsibilities III. Rolas & Responsibilities III. Rolas & Responsibilities III. Rolas & Responsibilities III. Rolas & Responsibilities III. Audit / Verification III. Rolating & Discounting	£ + + + + + + + +		Finance Financ	Purchasing	+ + + + + + + + + + + + + + + + + + +	Regulations	# + + + + + + + + + + + + + + + + + + +	104 r Mgt	Engineering
10.10 WORKING WITH GOVERNMENT AGENCIES 1. Regulatory Compliance 30.5. AVOIDING CONFLICTS OF INTEREST	+	+			•	4			*

FIG. 4



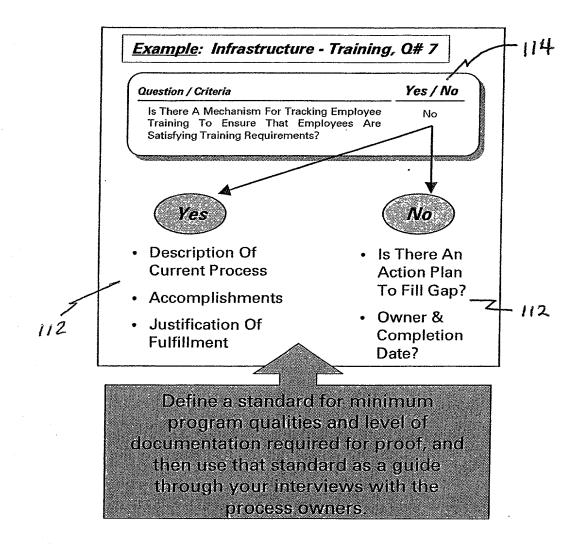


FIG. 5

001

GE Widgets Compliance Program Assessment (CPA)
Business Location:
201
INFRASTRUCTURE
L. LEADERSHIP COMMITMENT & OPERATIONAL OWNERSHIP
Yor N or NA Current State Toolefilledium Objective - Action Plan Owner
1 is compliance regularly on the agenda for senior leadership Y business reviews & meetings?
2 Are the business leader & his / her direct reports aware of the Y most important compliance risks and requirements in the business?
3 is a compliance strategy communicated regularly across the Y Business by the Business leader & his/her direct reports?
4 Do functional leaders regularly discuss the compilance strategy N & relevant compilance issues with their organizations?
5 is compliance included as part of the Appraisal and Incentive N Compensation process?
1.22
126

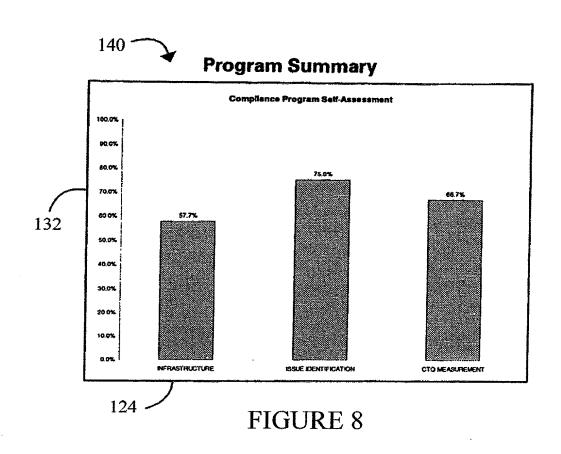
FIG. 6

130

QUESTIONNAIRE ME	TRICS		
COMPANY - LOC	CATION	4	
DATE			
		136 ,	134
INFRASTRUCTURE	Score	Opps	% Met
Leadership, Commitment & Operational Ownership	3	6	50.0%
Training	3	6	50.0%
Communication & Management Reporting	6	9	66.7%
Resources	2	4	50.0%
Discipline & Enforcement	1	1	100.0%
INFRASTRUCTURE	15	26	57.7%
ISSUE IDENTIFICATION	6	8	75.0%
CTQ MEASUREMENTS	2	3	66.7%
20.2 EQUAL EMPLOYMENT OPPORTUNITY	5	5	100.0%
20.3 HEALTH, SAFETY, & ENVIRONMENTAL PROTECTION	. 2	6	33.3%
20.4 ETHICAL BUSINESS PRACTICES			

Tabulated Results Spreadsheet - Analysis

FIG. 7



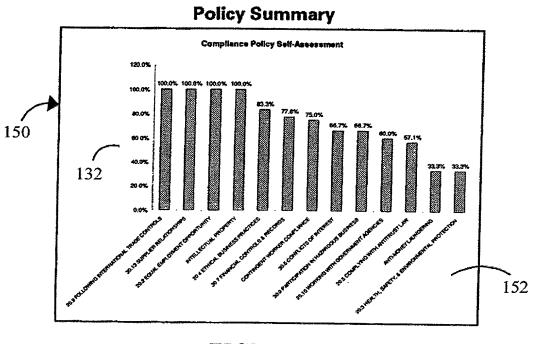


FIGURE 9

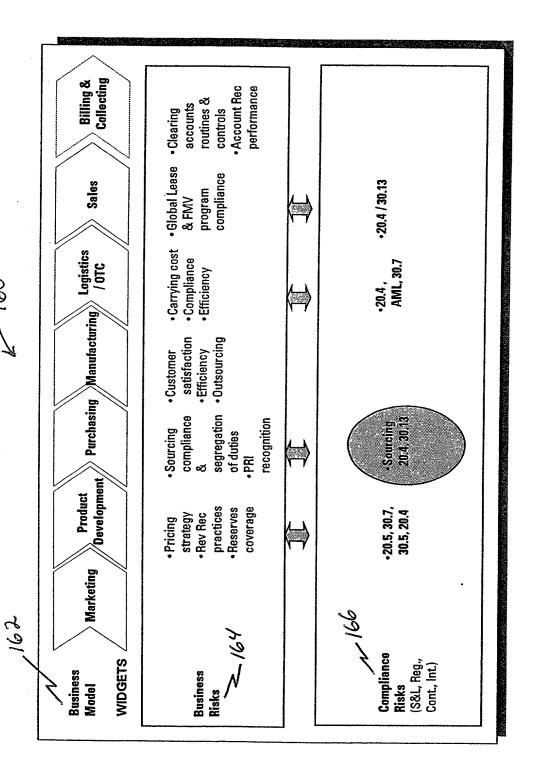
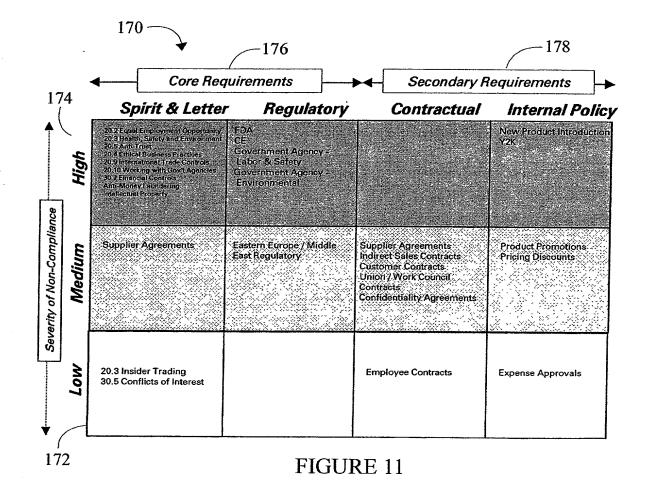


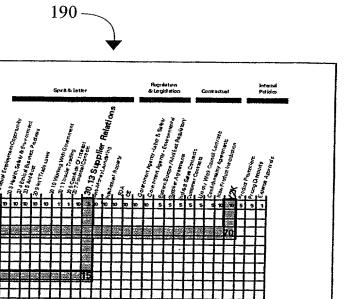
FIG. 10



Spirit & Line Spirit & Line	Internal Policies	Product Promotions Expense Approvals	Ŧ	I	1			1	T		Ŧ	T	Ţ-	
Split & Letter 20.2 Equal Employment Opportunity 20.2 Equal Employment Opportunity 20.3 Health, Safety & Environment 20.3 Health, Safety & Environment 20.4 Shintly Frieded Laws 20.5 In In Trade Laws	Contractual	Confidentiality Agreements Vew Product Introduces					-							
So. Sequal Employment Opportunity 20.2 Equal Employment Opportunity 20.3 Health, Safaty & Environment 20.3 Antitudat 20.4 Ethical Business Practices 20.5 Antitudat 20.6 Antitudat 20.7 Antitudat 20.7 Antitudat 20.7 Antitudat 20.7 Antitudat 20.8 Antitudat 20.7 Antitudat 20.8 Antitudat 20.8	Regulation & Legislation	Indirect Sales Corre												
is oing is ance in the state of	Spirit & Letter	-20.9 Int.) Trade Laws -20.9 Int.) Trade Laws -20.13 Supplier Relations -20.14 Insider Trading -20.15 Insider Trading -20.15 Insider Trading -20.16 Working With Government -20.17 Financial Controls -20.18 Insider Trading -20.19 Working With Government -20.19 Inside Laws -20.19 Insider Trading -20.19 Insider Trading -20.10 Working With Government -20.10 Working With Gove												
		20.2 Equal Employment	Information Systems		Product Development			1.1.1 Distributor	1.1.2 Sales Agents	1.2 Direct Sales Force	Billing & Collecting			System Implementations

FIG. 12

polistics / OTC



		Severity	X	Process Strength	=	QFD Score	
•	30.13 Product Development	5		3		15	_
•	Y2K Physical Product Upgrades	10		7		70	-

FIGURE 13

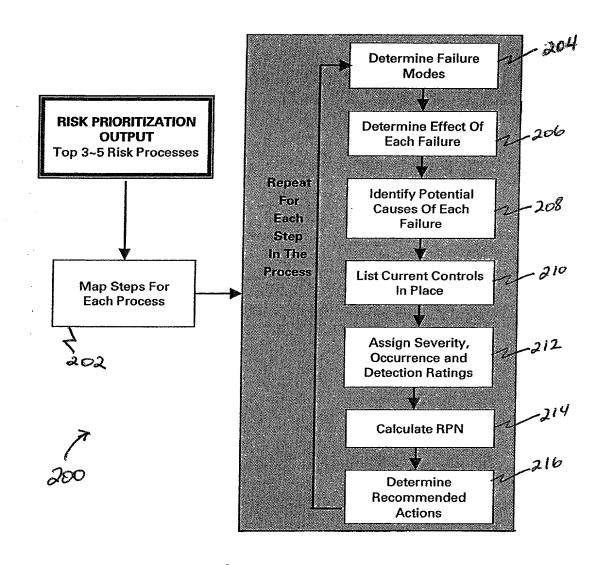


FIG. 14



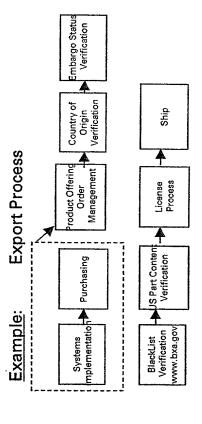


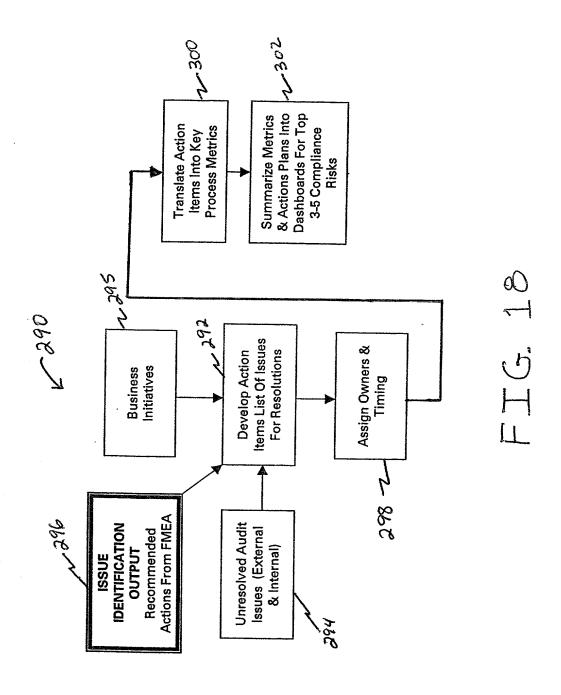
FIG. 15

	Resp.	A.H/R.N.	A.H. / R.N.	B.M/R.N
242 252 025	Actions Recommended	Validate similar risk with Marquette US. A.H/R.N. Submit an RTA to request the development and implementation of		
1.	ша:	556	486	467
<u> =</u>	0 11	7	8	6
HE MARK	6 Current Controls	None. Manual data gathering available but tedious.	Approved Internal Export Control 7 Process (Seite 2 von 2) but manually	executed No process controls in place
othe sto	Potential Causes		Inaccuracy in part content verification process	7 Resource Allocations for this process is undefined.
, o	6 11 7	Fear	Inace	Reso this p
238	Potential Fallura Effects E	Inability to acquire Part Origin 8 No Current Reporting and US Content easily for the logistics process.	More Goods than are allowed 8 are shipped to sensitive customers	Accountability in Process Ship without liscenses and 7 Steps/ Structure potential loss of sales
,236 Ja34	Potential Failure Mode	Information Current Oracle Systems Systems Programming does not Implementation deliver required info for 20.9	The calculation of the More Good percent value of US Part are shipped to total order may not be customers accurate	Accountability in Process Steps/ Structure
4000	Process Step/Input	Information Systems Implementation	US Part Content Inspection	License Verification

FIG. 16

Maintein a 12 month rolling average of import compliance levels based on monthly sar ĭ Relatively High Inherent Risk and Relatively Strong Processes Relatively Low inherent Risk and Relatively Strong Processes 90% Required Retatively High Inherent Risk and Relatively Weak Processes Compliance က Relatively Low Inherent Risk and Relatively Weak Processes 95% Target ဖ **Process Risk** 92% Avg 95% 92% 98% 98% 93% 2 278 95% HI CORETIES. Classification # # # Valuation 5 Quantity Record %00 %66 %06 85% %08 75% Special Inherent Risk 1.7 20 **98**A 2.0 TAssist Volume * Import Volume 97A Total Score Out of 15 ===> is there at least one field in each of the following documents that can be found throughout: is there an Import/ Customs focused compliance training held for: legal, sourcing, finance, Reviewing and evaluating any Special Programs in which the business participates? (GSP, Have implementation tollgates been established to address Customs compliance with new Does the business or CBSI have a single database of all customs entries for the business? Has overall responsibility for Import/ Customs compliance been assigned to specific high-Does the import compliance process include monitoring of customs clearance agents to Is there an existing database (or equivalent) containing HTSUS classifications for all Indicate total \$ value of assists provided to suppliers, including materials, tooling or engineering work provided to the supplier free of charge or at a reduced cost. Index of Import Activity Indicate total \$ value of US imports for past 2 years and current year estimate: Process Risk Assessment Inherent Risk Assessment 366 ensure that documents filed on behalf of GE are accurate and complete? Sourcing to use for Import compliance when creating a purchase order? Valuation of non-transactional shipments (defectives, samples, etc.)? Import Activity (\$MIM) Reviewing and issuing NAFTA certifications for eligible products? Entry Package, PO or equivalent, Receiver, Commercial Invoice? 98A Identifying additional payments made to suppliers? Import specialists to manage the Import process? Brokers to use when creating entry summaries? Recording, tracking and reporting assists? Are there Standard Procedures for: 97A アプル Routines & Controls and engineering? 10.0 8.0 6.0 0,4 Import Volume Assist Volume Infrastructure 5 1 2 2 2 2 2

FIG. 17



Compliance Program Assessment

1. Program Assessment

2. Policy Assessment

Risk Prioritization

3. Summary of Risk Prioritization

Issue Identification

4. Drilldown on Top 3-5 High Risk Areas

Mitigation And Control

5. Schedule 2

6. Dashboards

Training Metrics

7. Monitor Key Metrics Critical To Training Success

Standard Template

Percentage Score In Program Areas

Action Plans To Improve

Standard Template

Percentage Score In Policy Areas

Action Plans To Address

Standard Template

Define Top 3-5 Most Significant Risk Drivers Risk To Process Controls Matrix

Business Specific Template (Examples Attached)

Trends/ Key Issues

Action Plan

Scorecards

Business Specific Template (Examples Attached)

List Of Actions With Assigned Owner & Timing

Business Specific Template (Examples Attached)

Business Specific

FIG. 19

Summarize Corrective Actions, Owners & Timing Dashboards on Top 3-5 Risk Areas

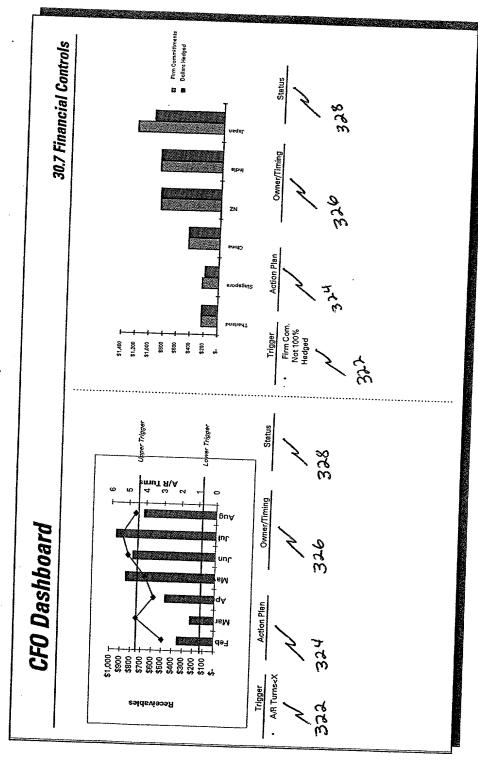


FIG. 20